

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION

\*\*\*\*\*  
SHANTA LYNETTE BROWN, et al.,

Plaintiffs,

v.

Case No. 6:23cv00054

THE CITY OF LYNCHBURG, et al.,

Defendants.

\*\*\*\*\*

DEPOSITION OF SHANTA BROWN

October 25, 2024

9:36 a.m. - 11:16 a.m.

Lynchburg, Virginia

REPORTED BY: Kimberly A. Henderson, RPR

Deposition of SHANTA BROWN, taken and transcribed on behalf of the Defendants, pursuant to notice and/or agreement to take depositions; by and before Kimberly A. Henderson, a Registered Professional Reporter and Notary Public in and for the Commonwealth of Virginia at Large; commencing at 9:36 a.m., October 25, 2024, at the offices of the Lynchburg City Attorney, 900 Church Street, Lynchburg, Virginia.

APPEARANCES OF COUNSEL:

JAMES RIVER LEGAL ASSOCIATES  
7601 Timberlake Road  
Lynchburg, Virginia 24502  
434.845.4529  
kthomas@vbclegal.com  
BY: PAUL VALOIS, ESQUIRE  
Counsel for the Plaintiffs

GUYNN, WADDELL, CARROLL & LOCKABY, P.C.  
415 S. College Avenue  
Salem, Virginia 24153  
540.387.2320  
jimg@guynnwaddell.com  
john@guynnwaddell.com  
BY: JIM H. GUYNN, JR., ESQUIRE  
JOHN R. FITZGERALD, ESQUIRE  
Counsel for the Defendants

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

I N D E X

WITNESS

PAGE

SHANTA LYNETTE BROWN

Examination by Mr. Guynn

4

Examination by Mr. Valois

41

Examination by Mr. Guynn

45

Examination by Mr. Valois

47

1 (9:36 a.m., October 25, 2024)

2  
3 SHANTA LYNETTE BROWN

4 was sworn and testified as follows:

5 E X A M I N A T I O N

6 BY MR. GUYNN:

7 Q. Good morning, Ms. Brown.

8 A. Good morning, sir.

9 Q. My name is Jim Guynn, and as I'm sure  
10 Mr. Valois has told you, I represent the defendants  
11 in the lawsuit you brought.

12 A. Yes.

13 Q. And I'm going to be asking some  
14 questions this morning, and a couple of things that  
15 we can do. Our court reporter is going to prepare  
16 a transcript of your testimony, not today, I mean,  
17 you know, it takes her a while to do it.

18 A. Got you.

19 Q. But some of the things, when she goes  
20 back and does it, that will help her, two in  
21 particular that I always try to stress. One is  
22 let's try not to talk over each other.

23 A. Okay.

24 Q. I will wait until you finish your  
25 answer, and you wait until I finish my question,

1 and that's going to help her.

2 A. Okay.

3 Q. And the second thing is try not to  
4 use uh-huh or huh-uh in your answers.

5 A. Yes.

6 Q. Because she can't spell that.

7 A. Okay.

8 Q. All right. So we don't know what we  
9 get, you know, at the end. And if you do, I might  
10 kind of look at you and prompt you a little bit to,  
11 you know, go ahead and say yes or no.

12 A. Yes.

13 Q. Okay. You doing all right today?

14 A. I am, thanks for asking.

15 Q. Have you been deposed before?

16 A. What's that mean?

17 Q. What we're doing today?

18 A. No.

19 Q. Okay. As I'm sure Mr. Valois has  
20 told you, I'm going to ask you some questions. If  
21 you don't understand my question, just tell me you  
22 don't understand it.

23 A. Yes.

24 Q. And you won't be the first, trust me.

25 A. Okay.

1 Q. If you don't hear it -- more likely  
2 you'll hear it, but nonetheless, if you don't hear  
3 it, ask me to repeat it. I'll be glad to do that.

4 A. Okay.

5 Q. So what I want to make sure of is  
6 when we're finished, that you have understood all  
7 my questions and heard all my questions, and that  
8 your answers reflect that.

9 A. Okay.

10 Q. All right. Where do you live,  
11 Ms. Brown?

12 A. I live in Lynchburg.

13 Q. What's your address?

14 A. 1445 Ashbourne Drive, Lynchburg,  
15 Virginia 24501.

16 Q. How long have you lived there?

17 A. I just moved there in December of  
18 2023.

19 Q. Where did you live before that?

20 A. 1503 Kemper Street, Apartment 103,  
21 Lynchburg, Virginia 24501.

22 Q. And I think that's, that was where  
23 you were living on April 28th, 2020?

24 A. Yes, sir.

25 Q. Okay. And April 28th, 2020, can we

1 agree that's the date of the incident that's given  
2 rise to this lawsuit?

3 A. Yes, sir.

4 Q. Are you currently employed?

5 A. I am.

6 Q. Okay. Where do you work?

7 A. Food Lion Memorial Avenue.

8 Q. How long have you worked at Food  
9 Lion?

10 A. About four-and-a-half years.

11 Q. Where were you working on April 28th,  
12 2020?

13 A. Buckingham Correctional Center.

14 Q. Is Buckingham Correctional Center a  
15 Department of Corrections facility?

16 A. Yes.

17 Q. State facility?

18 A. Yes.

19 Q. What was your job at Buckingham?

20 A. I was a corrections officer.

21 Q. How long had you been a corrections  
22 officer?

23 A. At that time, what year?

24 Q. 2020?

25 A. Yeah, 2020. I think I started

1 September 2017.

2 Q. And were you, did you work the floor  
3 at the correctional center?

4 A. Yes.

5 Q. Okay. Making rounds and doing that  
6 sort of thing?

7 A. Yes.

8 Q. What training did you go through to  
9 become a correctional officer?

10 A. What do they call it? We went  
11 through like physical training. We had to, you  
12 know, touch, throw each other around to be able to  
13 deal with the inmates at the prison. I don't know  
14 exactly what the name of it, or the place that we  
15 went to, but I know --

16 Q. Let me see if I can help you a little  
17 bit with that?

18 A. Okay.

19 Q. Were you, was it a criminal justice  
20 academy?

21 A. Yes.

22 Q. Do you know if it was state run or if  
23 it was run by localities?

24 A. I don't know.

25 Q. And it was to get you certified as a



1 correctional officer?

2 A. Yes.

3 Q. And did it include lectures and  
4 training on things like policies and  
5 constitutionality and things like that?

6 A. Yes.

7 Q. And then you were talking about  
8 throwing people around and that sort of thing.

9 Is that, did they call that defensive  
10 tactics?

11 A. Defensive tactics, yes.

12 Q. Okay. And how long was your whole  
13 program to be certified?

14 A. I think it was six weeks.

15 Q. And then you were certified and  
16 assigned to work at Buckingham?

17 A. Yes.

18 Q. Did your shifts at Buckingham rotate?

19 A. Yes.

20 Q. So what, on a regular day, what were  
21 your job duties as a correctional officer?

22 A. Sometimes I would stand in the  
23 hallway, so when the inmates come out of the units  
24 that we would have to make sure that they're not  
25 passing off, you know, merchandise to each other.

**EXHIBIT 6**

Page 10

1 Going -- make sure they're going where they're  
2 supposed to go to.

3 So then if I'm not doing that, I'm  
4 watching the -- in the -- in the, what you call it?  
5 Dorms. Like we're in there, and we're making sure  
6 they're not fighting or passing drugs and stuff  
7 like that.

8 Q. You said you were trained in  
9 defensive tactics?

10 A. Yes.

11 Q. Did you ever have to use that  
12 training?

13 A. No.

14 Q. Okay. Never had to wrestle with  
15 anybody?

16 A. No.

17 Q. Never went hands-on with an inmate?

18 A. No.

19 Q. Are you from the Lynchburg area  
20 originally?

21 A. Yes.

22 Q. Okay. Do you have family that lives  
23 in Lynchburg?

24 A. Yes.

25 Q. Mr. Valois probably told you, but

1 we'll be picking a jury in this case, and so I'm  
2 hoping to get a little bit of a rundown, to be  
3 honest with you, so that I don't get your cousin on  
4 the jury.

5 MR. VALOIS: Good luck.

6 MR. GUYNN: Or closer or whatever.

7 MR. VALOIS: Shanta knows everybody  
8 in this town.

9 MR. GUYNN: I get that. I understand  
10 that.

11 BY MR. GUYNN:

12 Q. So are you married?

13 A. I am.

14 Q. Okay. And what's your husband's  
15 name?

16 A. Marcello Sandidge.

17 Q. Where does he work?

18 A. Bentley Commons.

19 Q. What does --

20 A. He's a chef.

21 Q. Okay. And you have children?

22 A. I do.

23 Q. Mr. Pannell is one of your children?

24 A. Yes, sir.

25 Q. And Ms. Sandidge is one of your

1 children?

2 A. Yes.

3 Q. Do you have other children?

4 A. Yes.

5 Q. Okay. What are their names?

6 A. Jarvis Brown.

7 Q. Does he live in Lynchburg?

8 A. No, sir.

9 Q. Surrounding area?

10 A. Yes.

11 Q. Where does he work?

12 A. It's a tree company.

13 Q. And again, I'm not, I'm really not  
14 being nosy, but when we get a jury list, the  
15 person's name and where they work comes up, so  
16 that's how I'll be able to know.

17 A. Got you.

18 Q. Do you have grandchildren?

19 A. Yes.

20 Q. That always gets a smile.

21 How many grandchildren do you have?

22 A. I have 12.

23 Q. What are their ages?

24 A. Oh, my God. I couldn't tell you.

25 Q. Are they in school?

**EXHIBIT 6**

Page 13

1 A. Yes, they are.

2 Q. What schools do they go to?

3 A. Well, I have one that lives in  
4 Germany. His mom is in the military. And then  
5 the -- two of them go to Lyn-CAG Head Start, and  
6 then the other ones, I don't know where they go to  
7 school at.

8 Q. Okay. But they live generally in  
9 Lynchburg, Campbell County area?

10 A. Yes.

11 Q. What are their last names?

12 A. They're all different. Jaden's last  
13 name is Brown. Chana's is Pannell, J.J. is Brown,  
14 Kiari is Sandidge, Nazari is Bush, Theory is Bush,  
15 and so on. I said I had 12 grandchildren.

16 Q. You did.

17 A. I didn't know all of the last names,  
18 but more than likely I will say they've taken after  
19 the father's last names.

20 Q. Okay.

21 A. So if it ain't a Brown, it's a  
22 Pannell.

23 Q. Are your parents still alive?

24 A. Yes.

25 Q. Do they live in the area?

**EXHIBIT 6**

Page 14

1 A. My mom does. My dad does not.

2 Q. What was your -- what was her last  
3 name?

4 A. Brandon.

5 Q. So we said earlier that April 28th,  
6 2020, is the date of this incident, and it appears  
7 from the records I've looked at that it happened in  
8 the evening.

9 Do you recall that?

10 A. It was dark outside, so, yeah. In  
11 the evening, yeah.

12 Q. So it happened after dark?

13 A. Yeah.

14 Q. So just kind of walk me through what  
15 you saw, what drew your attention to the front, I  
16 assume, it was to the front of your apartment?

17 A. Right. So I lived on the bottom  
18 floor, so I have a front view of the outside.  
19 Well, then I was cooking dinner. I had finished.  
20 It was me, my husband, and my daughter in the  
21 house, and we was getting ready, we had plated our  
22 food and was ready to eat.

23 And we saw the flashing lights  
24 through the blinds of the apartment, and I -- my  
25 daughter went to the window, and she was like,

**EXHIBIT 6**

Page 15

1 "Well, somebody got pulled over."

2 I said, "I don't care, as long as it  
3 ain't one of my children."

4 Q. Okay.

5 A. So I got to the window, and I stood  
6 there for a minute with the blinds open, you know,  
7 being nosy. And as the window came down on the  
8 vehicle, I saw that it was my child.

9 Q. Mr. Pannell?

10 A. Mr. Pannell, Terron Pannell, and I  
11 instantly grabbed my keys to go outside. I grabbed  
12 my keys, because we get locked out if we  
13 don't -- you had to have a key at that time to get  
14 back in, so I had to get my keys so I can get back  
15 in. And when I got outside, it was said, they said  
16 it was just a traffic stop and that he didn't have  
17 his driver's license.

18 But they had started asking questions  
19 to search his vehicle, and he declined that. So  
20 Officer Grooms was on scene talking to me at that  
21 time, but Officer Miller had asked her to go around  
22 to see if she could get him to allow them to  
23 search. But if it was a traffic stop, we were  
24 trying to figure out why he needed to search.

25 He allowed them to know that the

**EXHIBIT 6**

Page 16

1 vehicle wasn't his, for one, the reason why you  
2 couldn't search it. I wouldn't -- he wouldn't know  
3 what was up in there, and if something was there,  
4 of course, he's going to get charged with it.  
5 Well, from there, we were standing on the side and  
6 on the sidewalk.

7 Q. Now, when you say "we," had somebody  
8 else joined you?

9 A. Yes. My daughter came out with me.

10 Q. Ms. Sandidge?

11 A. Yes, Aquasha.

12 Q. Aquasha?

13 A. Yeah. So at that point, we were  
14 videoing just to help ourselves. Of course, you  
15 know, with the -- with police situations and people  
16 getting shot and dying and all this, we wanted to  
17 be just secure. So she was recording, and I was  
18 standing there.

19 And as they deny -- as he denied the  
20 fact, you know, at this point, he's  
21 saying -- oh, wait. Mr. Miller, Officer Miller had  
22 then called another -- he called the K9 unit. We  
23 were wondering what that was about.

24 Well, he called the K9 unit, which  
25 Officer Reed came on scene and wanted him to exit



**EXHIBIT 6**

Page 17

1 the vehicle. Well, talking to me, he's like,  
2 "Well, Ma, you know, now I fear for my life." I'm  
3 like -- going on the internet, I was looking,  
4 excuse me, you know, but I was looking on the  
5 internet for a situation for my oldest son is where  
6 I told him, wind the windows up. You're supposed  
7 to wind the windows up.

8 If you ask for a supervisor, ask for  
9 the supervisor, tell them you don't want to -- you  
10 want a supervisor, and they're supposed to get a  
11 supervisor for you. And you're supposed to lock  
12 your doors and wind your windows up. So he didn't  
13 wind windows up but he told them that he feared for  
14 his life.

15 And the man told him to get out. He  
16 refused to get out, Officer Reed, and they ended up  
17 pulling him out of the vehicle. The man opened the  
18 door and pulled him out the vehicle. Well, as a  
19 mother, you know, and not only that, I'm a mother  
20 of the law, and then I'm like, you can't do this.

21 So he, as he pulled him out, of  
22 course, I'm just like, "You can't do this to my  
23 son. Why are you doing this?" A lot took place  
24 that night and I was just in a black -- you know,  
25 having a child takes a lot and to have -- to watch

1    them be like taken over, or feel like you have  
2    no right, you feel like you have no right, you  
3    know, was just absurd.

4                    It was very emotional, you know, that  
5    night to watch that, and then to be handcuffed  
6    myself and thrown to the ground. My daughter, she  
7    was pregnant at that time with her oldest child,  
8    also be thrown to the ground and handcuffed and  
9    then taken and lied on down to the magistrate's  
10   office.

11                   Because when we got down there, the  
12   officers, of course, said that we assaulted them  
13   too, and that definitely didn't happen. So but we  
14   had to go along with the situation, and then to be  
15   appointed a lawyer that didn't want to do his job,  
16   to tell you to -- well, they're offering you this  
17   and --

18                   MR. VALOIS: Objection. For the  
19   record, can we name that lawyer, please?

20                   MR. GUYNN: I'm going to.

21                   MR. VALOIS: Okay.

22   BY MR. GUYNN:

23                   Q.    So you weren't happy with Mr. Valois?  
24   I'm just kidding.

25                   MR. VALOIS: Thanks a lot.

**EXHIBIT 6**

Page 19

1 BY MR. GUYNN:

2 Q. I'm just kidding.

3 I understood you were talking about a  
4 court-appointed attorney and not Mr. Valois?

5 A. Yes. The court-appointed attorney  
6 called and sent emails. To this day I still have  
7 his emails telling me that the prosecuting attorney  
8 wanted to give me a year and six months and take  
9 away one of the obstruction charges, but I can get  
10 a second opinion.

11 So at that moment I'm like, I don't  
12 even need your permission to get a second opinion.  
13 You just saying that I assaulted these officers,  
14 and that's definitely not what happened. So it was  
15 by God's grace and his mercy that -- I'm sorry.

16 Q. It's okay.

17 A. It's very emotional. That we came  
18 upon Paul. I heard, have heard so many situations  
19 where, you know, the officers or the police that  
20 pull people over and, you know, give them assault  
21 charges when it didn't even happen.

22 But again, I thank God that I was  
23 able to pull from my bag what I needed to pull to  
24 be able to get somebody that was actually on my  
25 side. Now, granted, the court-appointed lawyer

**EXHIBIT 6**

Page 20

1 that I was appointed, I tried to believe in him and  
2 knew that he was going to be that person to do his  
3 job as a lawyer, period, and see me through this.

4 But that definitely didn't happen.  
5 Because every day, you know, that -- when going  
6 down to the magistrate's office and my daughter  
7 ended up in jail for seven days, that really broke  
8 my heart. So the seven days, I had to pay to get  
9 her out, hoping that she could get out on her own,  
10 but because of the assault, I'm sure she couldn't.  
11 So we didn't even do that.

12 But we ended up paying to get her  
13 out, and then to have him have me get a second  
14 opinion on getting another lawyer, because I guess  
15 he didn't want to fight the case. I really will  
16 never know, but he'll definitely never be  
17 recommended to anybody.

18 Q. Let me back up a little bit to the  
19 beginning.

20 When you went outside, you said  
21 something about having seen something on the  
22 internet about rolling your windows up?

23 A. Yes. So --

24 Q. Can you tell me more about that, what  
25 you saw, who it was, or whatever?

**EXHIBIT 6**

Page 21

1           A.    Yes.   So my oldest son had gotten in  
2 the mix with someone else, a different situation,  
3 and he had gotten pulled over by the police. And  
4 so at this moment he has a, you know, a felony  
5 charge.

6                   And he asked me if, you know, they  
7 can do that, can -- because you have a felony  
8 charge, can the police, when they pull you over,  
9 tell you to get out because you are felon, a  
10 convicted felon or whatnot. I said, "Son, I don't  
11 know." So I'm going through the internet trying to  
12 find his answer.

13                   As far as that situation went, he got  
14 pulled over. They told him to get out because, you  
15 know, he was a convicted felon, so that they can  
16 search his vehicle or whatever. He complied. I  
17 wasn't there, of course, but he complied. And I  
18 guess they -- he went on. I'm not sure if he got a  
19 ticket or anything, but moving on.

20                   I was on the internet, and I was  
21 looking the stuff up so in case it happened again.  
22 And it was saying to -- if an officer asks you to  
23 do something, and you refuse to ask for a  
24 supervisor, you want to speak to their supervisor.  
25 You're supposed to wind the window up and lock the

**EXHIBIT 6**

Page 22

1 doors.

2 Q. And you don't -- do you know who it  
3 was that gave that advice?

4 A. Google.

5 Q. Mr. Google?

6 A. Google gave it, yeah. You punch  
7 things in on Google, and Google will tell you some  
8 stuff, you know. So I Googled some information,  
9 can police, or can, you know, Virginia police do  
10 this to you, whatever, whatever. So I Googled what  
11 it was that I asked, and, you know, stuff come up.

12 Q. And in particular, something came up  
13 that said you can roll up the window and ask for a  
14 supervisor?

15 A. Yes.

16 Q. And do you remember what website that  
17 was that it took you to --

18 A. I do not.

19 Q. -- or was there a YouTube video?

20 A. There was no YouTube videos, no.  
21 It's just me punching in a question on Google.

22 Q. Had your correctional officer  
23 training included anything about people in cars or  
24 anything like that?

25 A. No.

**EXHIBIT 6**

Page 23

1 Q. And then, so you said your son didn't  
2 roll up his windows?

3 A. No.

4 Q. And he was asked to get out of the  
5 car, told to get out of the car?

6 A. Yes.

7 Q. And didn't?

8 A. No.

9 Q. And he was saying that he was fearing  
10 for his life?

11 A. Yes.

12 Q. Up until that point, had you seen  
13 anything that would give him a reason to fear for  
14 his life? Was there a weapon drawn or anything  
15 like that?

16 A. I think the aggressiveness of the  
17 officer.

18 Q. When you say "officer," which  
19 officer?

20 A. Officer Reed.

21 Q. Okay.

22 A. So the aggressiveness that he came  
23 with is more likely why he said he feared for his  
24 life.

25 Q. Okay. And when you were in your

1 correctional officer training, did they teach you  
2 about probable cause?

3 A. Probable cause. Give me an example.

4 Q. Well, in order to arrest somebody,  
5 you got to have probable cause to believe they  
6 committed a crime?

7 A. Of course. Because you have some  
8 inmates that, of course, they'll lie or do things  
9 they're not supposed to do. And I actually was put  
10 in a situation like that; so, but, yeah, of course.

11 Q. And did you hear any conversation  
12 among the officers regarding probable cause for  
13 having -- you know, wanted to search the car or  
14 asking him to get out of the car?

15 A. No.

16 Q. Now, had your son had some problems  
17 with the law before?

18 A. Not too much that I can recall. He  
19 ain't the perfect child, but he ain't a problem  
20 child, if that makes sense.

21 Q. Had he had some, I'm trying to  
22 remember exactly, arrests and convictions, maybe,  
23 for marijuana possession?

24 A. Yeah. Yeah.

25 Q. And, in fact, wasn't he holding that



**EXHIBIT 6**

Page 25

1 night?

2 A. I don't know.

3 Q. Don't know?

4 A. No, I don't know.

5 Q. Were you there when they inventoried  
6 the contents of the car?

7 A. No. I was, at that moment, I think I  
8 was being arrested and put in the car to take  
9 downtown.

10 Q. Do you know whose car it was?

11 A. I do not.

12 Q. Did you happen to notice, when you  
13 came out, whether the car had a front license plate  
14 on it?

15 A. I don't remember, but I think that's  
16 what they was saying. It didn't have one of the  
17 licenses, didn't have front license. And they said  
18 in the state of Virginia, you do have to have a  
19 front license tag on your vehicle. But it's so  
20 funny, because after the incident, I took my  
21 license plate off of my car, and I drove it for a  
22 whole year, and no one ever stopped me.

23 Q. The front one?

24 A. Yes.

25 Q. Are you generally a safe driver?

**EXHIBIT 6**

Page 26

1 A. Yes.

2 Q. Stop for stop signs and red lights  
3 and all that?

4 A. Yes. Was at a plus five with the  
5 DMV. My mom said I drive too slow. As long as I  
6 get there on time, I'm okay.

7 MR. VALOIS: So does all the rest of  
8 Lynchburg.

9 BY MR. GUYNN:

10 Q. You said you kind of blacked out a  
11 little bit as this was going on?

12 A. Yes.

13 Q. Have you had the opportunity, since  
14 it happened, to look at the video from the  
15 officers' body cams?

16 A. I did in court, but it's so  
17 terrifying. Like, I'm -- still brings me to tears  
18 because of the situation, and how it took place, or  
19 how it happened. And then the way the scene was,  
20 it was like somebody had done died. You know,  
21 they -- it was so many police there for the  
22 situation. Like it was so crazy.

23 So looking at the video and stuff,  
24 it's -- my anxiety is so bad because of this. I  
25 can't even really look at the video. I don't like

**EXHIBIT 6**

Page 27

1 looking at the video. But sitting in court,  
2 because it had to be played, yeah, I looked at  
3 certain parts of it. But for the most part, no.

4 Q. Well, and I'm -- my curiosity is  
5 because you indicated in your testimony that you  
6 sort of blacked out?

7 A. Yeah.

8 Q. Did the video sort of remind you of  
9 what you did?

10 A. Yes.

11 Q. Okay. So based on that, do you  
12 recall going over to where the officers were, I  
13 guess they were -- were they handcuffing your son  
14 at that point?

15 A. They were actually just kneeled down  
16 on him. He was already handcuffed.

17 Q. Okay.

18 A. Because he was handcuffed when he was  
19 standing up, and they searched him, and then they  
20 turned around and threw him on the ground, and then  
21 they kneeled on him.

22 Q. Were you able to see whether or not  
23 he complied with their direction with regard to  
24 searching him?

25 A. On the video it showed that they

**EXHIBIT 6**

1 searched him on one of the -- I think he was  
2 standing against one of the units, the vehicles,  
3 and they searched him then. But again, he was  
4 handcuffed then.

5 Q. Did the video show them removing him  
6 from the car?

7 A. Yeah, putting him on the ground? I  
8 think so.

9 Q. So they opened the door, obviously,  
10 because they --

11 A. His, the car that he was in?

12 Q. Yeah?

13 A. Yes.

14 Q. They opened the door of the car he  
15 was in?

16 A. Yes, Officer Reed.

17 Q. Yeah. And did he reach in and grab  
18 him?

19 A. I would suppose, yes.

20 Q. Do you recall that from the video?

21 A. Yes. And the door opened, and they  
22 come out, and when they came out, they were all on  
23 the ground.

24 Q. They handcuffed him on the ground?

25 A. Yes.

**EXHIBIT 6**

Page 29

1 Q. And then picked him back up?

2 A. Yes. And then put him back down.

3 Q. Was he -- was he in the process of  
4 being searched when they put him back on the  
5 ground?

6 A. No, not that I can recall. He was  
7 standing up in the -- once they took him out of the  
8 vehicle and put him on the ground, they handcuffed  
9 him, picked him up, stood him by the unit, searched  
10 him then, and then put him back on the ground.

11 Q. Did you have occasion, when you were  
12 working at Buckingham, to have to search inmates?

13 A. No.

14 Q. Were you taught how to do it in your  
15 correctional school?

16 A. Yes.

17 Q. And you have to search arms, legs,  
18 not -- I mean, obviously, there are private areas,  
19 but you try and search without getting to?

20 A. They teach you how to do it, yeah.

21 Q. Yeah. It's uncomfortable for me too,  
22 but I think we're on the same page?

23 A. Yes.

24 Q. That there are a lot of different  
25 places where people try to hide things.

**EXHIBIT 6**

Page 30

1 Do you recall, in the video, telling  
2 your son, or telling the officers that they can't  
3 remove him from the car? Does that sound familiar?

4 A. I do not recall.

5 Q. Do you have a belief that the  
6 officers don't have the right to ask someone to get  
7 out of their car when they stop them?

8 A. I'm going to go back to Google. Now,  
9 on Google, it'll say if they ask you to, just  
10 comply and then you can fix it later, you know, if  
11 you have to go to court or whatever.

12 Q. Have you discussed with your son,  
13 since this incident, what went on?

14 A. No. We don't talk about the  
15 incident.

16 Q. Do you see him on a regular basis?  
17 Does he live with you?

18 A. No, he doesn't live with me.

19 Q. Okay. How often do you see him?

20 A. When he calls.

21 Q. Which is how often?

22 A. Every day.

23 Q. Okay.

24 A. They check on me every day, make sure  
25 I'm okay.

**EXHIBIT 6**

Page 31

1 Q. And when you say you see him, is that  
2 FaceTiming on your phone?

3 A. Yes.

4 Q. You mentioned that you had anxiety  
5 since this?

6 A. Yes.

7 Q. Okay.

8 A. Bad anxiety. I ended up having to go  
9 see my doctor, and she prescribed me some  
10 medication. I don't know the name of the  
11 medication, but I can probably, you know, get it to  
12 you later.

13 Q. Who is your doctor?

14 A. Dr. Kozak, Brenda Kozak, in Madison  
15 Heights at the Johnson Health Center.

16 Q. Okay. K-o-z-a-k, Kozak?

17 A. Yes.

18 Q. And she's your regular family  
19 physician?

20 A. Yes.

21 Q. And you went to see her after this  
22 because of the anxiety?

23 A. It was so bad I was -- it was so bad  
24 I was calling the lawyer and telling him about it,  
25 and yes, I had to go see her.

**EXHIBIT 6**

Page 32

1 Q. Did you have any physical injuries as  
2 a result of the arrest?

3 A. Yeah. I was scratched up on my legs,  
4 yes.

5 Q. Did you have to seek medical  
6 treatment for that?

7 A. No.

8 Q. Maybe over the counter or whatever,  
9 salve or something?

10 A. Yeah. A little ibuprofen, some cream  
11 and stuff so that it wouldn't be so bad, the marks.

12 Q. Now, you said at the time you were  
13 working at Buckingham Correctional Center, and now  
14 you're working at Food Lion.

15 Why did you make that change?

16 A. Okay. So while working at  
17 Buckingham, I decided I wanted to get a part time,  
18 so I started Buckingham in September 2017, and then  
19 '19 I started at Food Lion. So it was just me  
20 wanting to do some other stuff.

21 Q. This incident didn't have anything to  
22 do with that?

23 A. No. Actually, I was glad I was, you  
24 know, still working, because -- well, losing the  
25 job at Buckingham, I was suspended first before I



**EXHIBIT 6**

1 actually lost my job. The night of the incident, I  
2 had to report back to Buckingham to allow them to  
3 know that I wouldn't be in the next day, or  
4 whenever, because I got arrested.

5 So I know when you get arrested you  
6 got to report so that whatever you got to go  
7 through, you know. So, but I was suspended until a  
8 report came through from the Lynchburg Police  
9 Department to my job with false accusations about  
10 the incident. And then my job took a turn for the  
11 worse. I was terminated.

12 Q. Well, a minute ago I asked you if it  
13 had -- if your change in jobs had anything to do  
14 with this incident, and you said no?

15 A. Well, I thought you mean having a  
16 second job.

17 Q. Okay.

18 A. You know, with the Buckingham job,  
19 because of me leaving here. I was already working  
20 there.

21 Q. But if I understand correctly, then,  
22 what you're telling me is that because of the  
23 reports of this incident that went from the  
24 Lynchburg police to the Buckingham folks, the  
25 administration at Buckingham Correctional, they

**EXHIBIT 6**

Page 34

1 terminated your employment?

2 A. With the Buckingham, yes.

3 Q. Did you file a grievance?

4 A. I did not file a grievance. I wanted  
5 to see the situation through, because I -- of  
6 course I thought I was going to be all right with  
7 the lawyer that I had at that time. But no, I  
8 didn't file a grievance. So I just let this  
9 situation go on through, you know.

10 Q. Did your hours increase in Food Lion  
11 after you left?

12 A. No. They were still the same, so  
13 that was a struggle.

14 Q. Have you found another job since then  
15 to make up for the difference?

16 A. I had been trying to find a job  
17 before. After the situation, I was trying to find  
18 a job, and it was still with the state, but because  
19 it was still showing on my record that I assaulted  
20 a police officer, they wasn't giving me no job.

21 So I had to wait until all that  
22 cleared off for me to get my interview through  
23 where I was getting it, and I still didn't get that  
24 job. But -- and that was probation and parole. So  
25 I became full time at Food Lion just this year

1 after Mother's Day.

2 Q. Okay. So you are now full time?

3 A. Yes, at Food Lion.

4 Q. And your record for this has been  
5 expunged?

6 A. Yes.

7 Q. So I would assume going forward, it's  
8 not going to be an issue for you from an employment  
9 standpoint?

10 A. Well, if they ask about the  
11 expungement, because, you know, some -- a lot of  
12 jobs that you go on, especially dealing with the  
13 state, they still have a question. And I don't lie  
14 to them, you know. Even though it's expunged, I  
15 don't go in there and say, well, this is expunged,  
16 you shouldn't be asking me this. But they're still  
17 going to ask, and I still feel obligated to tell  
18 them.

19 Q. I didn't realize that in a background  
20 check or whatever that an expungement shows up?

21 A. Yeah.

22 MR. VALOIS: For certain purposes.

23 BY MR. GUYNN:

24 Q. Ms. Brown, prior to the incident  
25 here, on April 28th of 2020, did you know any of

1 these police officers?

2 A. No.

3 Q. Never had any contact with them, to  
4 your knowledge?

5 A. No.

6 Q. Had no reason to believe they had  
7 anything personally against you --

8 A. No.

9 Q. -- before this?

10 Have you -- since the court  
11 appearance and whatever, have you run into any of  
12 them?

13 A. Yes.

14 Q. Okay. Who have you run into?

15 A. The detective.

16 Q. Okay. That would be Detective  
17 Miller?

18 A. Detective Miller, yes.

19 Q. Okay.

20 A. I'll just see him. I don't even  
21 know, I don't even think he knows who I am.

22 Q. So you haven't talked to him or had  
23 any interaction?

24 A. No, no communication, no talk, no.

25 And that's only because he goes into the 7-Eleven

1 store on Memorial Avenue here in Lynchburg. He  
2 goes in there, get coffee and stuff. I go in there  
3 and get coffee, too.

4 Q. Okay.

5 MR. VALOIS: Where is there a  
6 7-Eleven on Memorial?

7 THE WITNESS: Oh, Fort Avenue.

8 MR. VALOIS: Okay.

9 THE WITNESS: Fort Avenue, my bad.

10 MR. VALOIS: That's right. Sorry, I  
11 don't mean to take over the deposition. I just  
12 happen to know there's not a 7-Eleven on Memorial  
13 Avenue.

14 MR. GUYNN: Be right back.

15 MR. VALOIS: Sure.

16 MR. GUYNN: Almost finished.

17 (Recess.)

18 BY MR. VALOIS:

19 Q. Just a couple more questions,  
20 Ms. Brown. You said you saw the lights when y'all  
21 were just getting ready to sit down to eat dinner?

22 A. Yes.

23 Q. And it was you and your husband and  
24 your daughter?

25 A. Yes.

1 Q. Did he ever come out of the apartment  
2 while this was going on?

3 A. My husband?

4 Q. Yeah?

5 A. Yes.

6 Q. At what point did he come out?

7 A. I think he said he heard me holler.  
8 I don't really know, but I know he said he was  
9 standing at the door, at the front door. Because  
10 remember, I said we had to have a key to go back  
11 in.

12 He was standing at the front door,  
13 and as Detective Miller was trying to put my  
14 daughter down and take her phone from her, they  
15 nudged him back into the door, because she was  
16 trying to give the phone to her dad, but that's all  
17 I got from that. They pushed him back into the  
18 door, and he could see through the glass.

19 Q. And did your son live with you at the  
20 time?

21 A. Yes.

22 Q. Okay. So he was coming home,  
23 essentially?

24 A. Yes. I would suppose.

25 Q. Well, I mean, he's coming --

**EXHIBIT 6**

Page 39

1 A. He got pulled over into the --

2 Q. -- when he came to your house -- when  
3 he came to your apartment, I mean, he spends the  
4 night there at that time, so he was coming --

5 A. Yes.

6 Q. That's how you would have viewed it?

7 A. Yes.

8 Q. And the video you said your daughter  
9 took?

10 A. Yes.

11 Q. Okay. Where is it?

12 A. I have it right here, but it's going  
13 dead.

14 MR. VALOIS: You got it right where?

15 BY MR. GUYNN:

16 Q. I'm sorry, the battery is going dead?

17 A. Yeah.

18 Q. Oh, okay. All right.

19 A. I have a video.

20 MR. VALOIS: Is it on a phone?

21 THE WITNESS: Yeah, it's a pad.

22 MR. VALOIS: Is it an iPhone or is it  
23 a --

24 THE WITNESS: No, it's just a pad.

25 MR. GUYNN: Oh --

**EXHIBIT 6**

Page 40

1 THE WITNESS: It's not even an iPad.

2 It's like one of the little --

3 MR. VALOIS: Tablet thing?

4 THE WITNESS: Yeah, a tablet.

5 BY MR. GUYNN:

6 Q. Yeah, but that, but it still exists?

7 A. Yes.

8 MR. VALOIS: Does it work?

9 BY MR. GUYNN:

10 Q. You just charge the battery up?

11 A. Yeah.

12 Q. Okay.

13 MR. VALOIS: Well --

14 BY MR. GUYNN:

15 Q. So that's something you can give to

16 Mr. Valois?

17 A. Yeah.

18 MR. VALOIS: I'll get it to you as

19 soon as we get it.

20 MR. GUYNN: Okay. Also, the husband,

21 what's the husband's name?

22 THE WITNESS: Marcello Sandidge.

23 MR. VALOIS: Was he on our -- I don't

24 know if he's on our Rule 26 disclosures or not, but

25 if he isn't, I'll put him.



**EXHIBIT 6**

Page 41

1 MR. GUYNN: I'm trying to remember.

2 MR. VALOIS: I'll add him.

3 MR. GUYNN: I don't, yeah --

4 MR. VALOIS: From what she said, I'll  
5 add him too.

6 MR. GUYNN: Well, we probably ought  
7 to find out what he knows.

8 MR. VALOIS: Yeah.

9 MR. GUYNN: What he saw too.

10 MR. VALOIS: He was there. It sounds  
11 like he had eyes on the thing.

12 MR. GUYNN: Yeah. All right.

13 Ms. Brown, that's all the questions I  
14 have for you. I'm not sure if Mr. Valois has  
15 questions or --

16 E X A M I N A T I O N

17 BY MR. VALOIS:

18 Q. Yeah, I'm going to ask just a couple,  
19 Shanta, frankly, just in case you die.

20 A. Okay.

21 Q. I hate to be gruesome about it.

22 MR. GUYNN: Do you have any plans for  
23 that?

24 THE WITNESS: Right.

25 BY MR. VALOIS:

**EXHIBIT 6**

Page 42

1 Q. But with that, I'm going to go ahead  
2 and ask you some.

3 Did you ever lay hands on Zach,  
4 Officer Zachary Miller?

5 A. No, sir, I never did.

6 Q. You ever touch him?

7 A. No.

8 Q. You ever threaten him in any way?

9 A. No.

10 Q. How about Seth Reed, did you ever lay  
11 hands on Seth Reed?

12 A. No, sir.

13 Q. Do you see Seth Reed on the video  
14 saying that you did?

15 A. Yes, sir.

16 Q. Was that truthful?

17 A. No, sir.

18 Q. All right. Did you  
19 have to -- you made bond at the magistrate?

20 A. Yes. I didn't have -- the magistrate  
21 that I talked to, I don't -- I don't remember his  
22 name, but I think he -- he didn't lock me up  
23 because I was an officer at that time.

24 And what I told him, when the  
25 two -- Officer Reed and Officer Miller went to

**EXHIBIT 6**

1 tell, you know, their side as I assaulted them,  
2 when they brought me in, he asked me the same  
3 thing, and I told him that they were lying. I  
4 never touched them. So he ended up letting me, on  
5 my own recognizance, sign myself out.

6 Q. But were you restricted during that  
7 period from traveling and stuff?

8 A. Yes. I was definitely restricted.

9 Q. And to clarify, there was a period  
10 there before this happened, when this happened, you  
11 were working two places?

12 A. Yes.

13 Q. You were working for the Department  
14 of Corrections at Buckingham; is that right?

15 A. Yes.

16 Q. You were also working for Food Lion;  
17 is that right?

18 A. Yes.

19 Q. And after this happened, you were  
20 suspended?

21 A. Yes.

22 Q. And then you were later terminated?

23 A. Yes.

24 Q. What caused the termination,  
25 specifically?

1           A.    The letter, the letter that they  
2 sent, the Lynchburg police sent back to -- the  
3 letter that the Lynchburg police sent back to  
4 Buckingham Correctional Center. They had asked, I  
5 guess, they inquired. They wanted to know what was  
6 going on.

7           Q.    Right. And did that letter, was it  
8 signed by Zachary Miller? Do you remember?

9           A.    I don't remember.

10          Q.    Did it contain truthful information  
11 or false information?

12          A.    False.

13               MR. VALOIS: That's all the questions  
14 I have.

15               MR. GUYNN: Doesn't prompt any from  
16 me. You have the right to read and review a  
17 transcript of this, of your testimony that the  
18 court reporter is going to prepare, or you can  
19 waive that right and authorize her to sign your  
20 name. You probably want to consult with your  
21 attorney as to which way to go.

22               MR. VALOIS: Oh, yeah, we'll read,  
23 read and sign.

24               MR. GUYNN: That's good. Thank you  
25 very much.

**EXHIBIT 6**

Page 45

1 (Recess.)

2 E X A M I N A T I O N

3 BY MR. GUYNN:

4 Q. You're still under oath.

5 In talking to Aquasha, she mentioned  
6 that she did her video on the phone, and you were  
7 talking about you had it on a tablet.

8 How did it get from the phone to the  
9 tablet?

10 A. I think we transferred it.

11 Q. Okay. Do you know if you  
12 transferred --

13 A. Because the tablet originally was my  
14 brother's, so he was videoing when he came on  
15 scene. I think, I'm not sure if my mom called him  
16 or what, because my mom also lives in the area, in  
17 the complex too. So she had seen the lights as  
18 well, and she came down. And I'm going to guess  
19 that she called him, because I didn't call him.  
20 And so when he came on scene, he brought the tablet  
21 and was videoing.

22 Q. So it has his video on it?

23 A. Yes.

24 Q. Does it have Aquasha's video on it?

25 A. Yes. We transferred it.

1 Q. Okay.

2 MR. VALOIS: It's got two videos on  
3 it?

4 THE WITNESS: Yea.

5 MR. VALOIS: On that tablet you have  
6 there?

7 THE WITNESS: Yeah.

8 MR. VALOIS: All right. We'll find  
9 them. Whatever is on there.

10 THE WITNESS: They're short. There's  
11 not nothing huge. It's just a lot of lights.

12 BY MR. GUYNN:

13 Q. Yeah. Where were you when your mom  
14 came down? Were you already arrested?

15 A. I think I was being taken down on the  
16 ground, and I couldn't tell you where she was.

17 Q. Have you talked to her about it? Do  
18 you know what she saw?

19 A. No, we don't talk about it, because  
20 it just --

21 Q. It upsets everybody?

22 A. Yeah, we don't talk about this. I  
23 don't want like talking about it, period.

24 Q. Okay.

25 A. But she was, she was down there,

**EXHIBIT 6**

Page 47

1 because I could hear her mouth. I could definitely  
2 hear her mouth.

3 MR. VALOIS: What's her name? Do you  
4 have the Rule 26 still up by chance?

5 MR. FITZGERALD: Yeah. One second.

6 MR. VALOIS: What's your mom's name?

7 THE WITNESS: Stella Brandon.

8 MR. VALOIS: Stella Brandon.

9 THE WITNESS: Yes. And so, you know,  
10 when family is in, you know, there, everybody want  
11 to know what's going on, why are they being  
12 arrested and stuff like that.

13 MR. VALOIS: Anybody else  
14 there -- well, I'm sorry. I'm taking over.

15 BY MR. GUYNN:

16 Q. You said your brother also came?

17 A. Yeah, he came down.

18 Q. And what's his name?

19 A. Ernest Brandon. But I don't even  
20 think they told him anything. Because I'm, you  
21 know, I was that adult at that time, so.

22 Q. Okay.

23 E X A M I N A T I O N

24 BY MR. VALOIS:

25 Q. Do they still live there?

**EXHIBIT 6**

Page 48

1 A. Huh?

2 Q. Does Stella live with Ernest?

3 A. She -- they don't live together.

4 Q. But they live at Kemper Street?

5 A. She lived at Kemper Street, and she's  
6 in the process of moving, so she'll not be there in  
7 November.

8 Q. Do you have phone numbers for any of  
9 these people?

10 A. Yeah.

11 Q. Do you have them on you?

12 A. Yeah. So my mom's phone number is  
13 (434)818-3 --

14 Q. Who's that?

15 A. My mother, Stella.

16 Q. Okay. (434)?

17 A. 818.

18 Q. 818?

19 A. 3262.

20 Q. All right. And Ernest?

21 A. My brother's number is (434)439-6869.

22 Q. Okay. Besides Stella and Ernest and  
23 your husband and Aquasha and your son, was there  
24 anybody else out there? You remember that one  
25 other person you told me about, right, at the



1 window or something?

2 A. Tiffany Huggins.

3 MR. VALOIS: I think she, Tiffany's,  
4 I think I disclosed.

5 MR. GUYNN: Yes.

6 BY MR. VALOIS:

7 Q. Other than Tiffany, is there anybody  
8 else that you can remember that was there now, as  
9 you've been through it, that we haven't named?

10 A. No, I don't know.

11 Q. Okay.

12 A. Because I wasn't --

13 Q. All right.

14 A. I was only upset the fact that I was  
15 going to jail.

16 Q. I understand. Well, if you think  
17 about it, make sure you let me know, because we  
18 have to -- if we know it, we got to let them know.  
19 We're supposed to tell them about anybody that we  
20 remember being there.

21 A. Okay.

22 Q. So if it comes to mind or somebody  
23 reminds you or something, just make sure you tell  
24 me. Okay?

25 A. Okay.

**EXHIBIT 6**

Page 50

1 MR. GUYNN: Is that it?

2 MR. VALOIS: That's it.

3 MR. GUYNN: Thank you again,

4 Ms. Brown.

5 THE WITNESS: Yes, sir, no problem.

6 (Reading and signature reserved.)

7 (Deposition concluded at 11:16 a.m.)

8 \*\*\*\*\*

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

COMMONWEALTH OF VIRGINIA AT LARGE, to wit:

I, KIMBERLY A. HENDERSON, a  
Registered Professional Reporter and Electronic  
Notary Public in and for the Commonwealth of  
Virginia at Large, Notary Registration Number  
359658, whose commission expires November 30, 2025,  
do certify that the aforementioned appeared before  
me, was sworn by me, and was thereupon examined by  
counsel; and that the foregoing is a true, correct,  
and full transcript of the testimony adduced to the  
best of my ability.

I further certify that I am neither  
related to nor associated with any counsel or party  
to this proceeding, nor otherwise interested in the  
event thereof.

Given under my hand and Notarial seal  
at Forest, Virginia, this 8th day of November,  
2024.

A handwritten signature in dark ink, reading "Kimberly A. Henderson", is written over a horizontal line.

Kimberly A. Henderson, Notary Public  
Commonwealth of Virginia at Large

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

CHANGES REQUESTED TO THE DEPOSITION OF:

SHANTA LYNETTE BROWN

TAKEN ON: October 25, 2024

Page/Line:	From:	To:	Reason:
------------	-------	-----	---------

_____
_____
_____
_____
_____
_____
_____
_____
_____
_____

\_\_\_\_\_

SHANTA LYNETTE BROWN

COMMONWEALTH OF VIRGINIA to wit:  
Subscribed to and sworn before me  
this \_\_\_\_\_ day of \_\_\_\_\_  
My commission expires

Notary Public

(AFFIX NOTARY SEAL)

<b>A</b>	14:16, 14:24 38:1, 39:3	<b>assume</b> 14:16 35:7	<b>body</b> 26:15	<b>car</b> 23:5, 23:5
<b>ability</b> 51:11	<b>appearance</b>	<b>attention</b> 14:15	<b>bond</b> 42:19	24:13, 24:14
<b>able</b> 8:12, 12:16	36:11	<b>attorney</b> 2:8	<b>bottom</b> 14:17	25:6, 25:8
19:23, 19:24	<b>APPEARANC...</b>	19:4, 19:5, 19:7	<b>Brandon</b> 14:4	25:10, 25:13
27:22	2:10	44:21	47:7, 47:8	25:21, 28:6
<b>absurd</b> 18:3	<b>appeared</b> 51:7	<b>authorize</b> 44:19	47:19	28:11, 28:14
<b>academy</b> 8:20	<b>appears</b> 14:6	<b>Avenue</b> 2:16	<b>Brenda</b> 31:14	30:3, 30:7
<b>accusations</b>	<b>appointed</b> 18:15	7:7, 37:1, 37:7	<b>brings</b> 26:17	<b>care</b> 15:2
33:9	20:1	37:9, 37:13	<b>broke</b> 20:7	<b>CARROLL</b>
<b>add</b> 41:2, 41:5	<b>April</b> 6:23, 6:25		<b>brother</b> 47:16	2:16
<b>address</b> 6:13	7:11, 14:5	<b>B</b>	<b>brother's</b> 45:14	<b>cars</b> 22:23
<b>adduced</b> 51:10	35:25		48:21	<b>case</b> 1:5, 11:1
<b>administration</b>	<b>Aquasha</b> 16:11	<b>back</b> 4:20, 15:14	<b>brought</b> 4:11	20:15, 21:21
33:25	16:12, 45:5	15:14, 20:18	43:2, 45:20	41:19
<b>adult</b> 47:21	48:23	29:1, 29:2, 29:4	<b>Brown</b> 1:3, 1:9	<b>cause</b> 24:2, 24:3
<b>advice</b> 22:3	<b>Aquasha's</b>	29:10, 30:8	2:1, 3:3, 4:3, 4:7	24:5, 24:12
<b>AFFIX</b> 52:25	45:24	33:2, 37:14	6:11, 12:6	<b>caused</b> 43:24
<b>aforementioned</b>	<b>area</b> 10:19, 12:9	38:10, 38:15	13:13, 13:13	<b>center</b> 7:13
51:7	13:9, 13:25	38:17, 44:2	13:21, 35:24	7:14, 8:3, 31:15
<b>ages</b> 12:23	45:16	44:3	37:20, 41:13	32:13, 44:4
<b>aggressiveness</b>	<b>areas</b> 29:18	<b>background</b>	50:4, 52:2	<b>certain</b> 27:3
23:16, 23:22	<b>arms</b> 29:17	35:19	52:19	35:22
<b>ago</b> 33:12	<b>arrest</b> 24:4, 32:2	<b>bad</b> 26:24, 31:8	<b>Buckingham</b>	<b>certified</b> 8:25
<b>agree</b> 7:1	<b>arrested</b> 25:8	31:23, 31:23	7:13, 7:14, 7:19	9:13, 9:15
<b>agreement</b> 2:3	33:4, 33:5	32:11, 37:9	9:16, 9:18	<b>certify</b> 51:7
<b>ahead</b> 5:11, 42:1	46:14, 47:12	<b>bag</b> 19:23	29:12, 32:13	51:12
<b>ain't</b> 13:21, 15:3	<b>arrests</b> 24:22	<b>based</b> 27:11	32:17, 32:18	<b>Chana's</b> 13:13
24:19, 24:19	<b>Ashbourne</b> 6:14	<b>basis</b> 30:16	32:25, 33:2	<b>chance</b> 47:4
<b>al</b> 1:3, 1:6	<b>asked</b> 15:21	<b>battery</b> 39:16	33:18, 33:24	<b>change</b> 32:15
<b>alive</b> 13:23	21:6, 22:11	40:10	33:25, 34:2	33:13
<b>allow</b> 15:22	23:4, 33:12	<b>beginning</b> 20:19	43:14, 44:4	<b>CHANGES</b>
33:2	43:2, 44:4	<b>behalf</b> 2:2	<b>Bush</b> 13:14	52:1
<b>allowed</b> 15:25	<b>asking</b> 4:13	<b>belief</b> 30:5	13:14	<b>charge</b> 21:5
<b>and/or</b> 2:3	5:14, 15:18	<b>believe</b> 20:1	<b>C</b>	21:8, 40:10
<b>answer</b> 4:25	24:14, 35:16	24:5, 36:6		<b>charged</b> 16:4
21:12	<b>asks</b> 21:22	<b>Bentley</b> 11:18	<b>call</b> 8:10, 9:9	<b>charges</b> 19:9
<b>answers</b> 5:4, 6:8	<b>assault</b> 19:20	<b>best</b> 51:11	10:4, 45:19	19:21
<b>anxiety</b> 26:24	20:10	<b>bit</b> 5:10, 8:17	<b>called</b> 16:22	<b>check</b> 30:24
31:4, 31:8	<b>assaulted</b> 18:12	11:2, 20:18	16:22, 16:24	35:20
31:22	19:13, 34:19	26:11	19:6, 45:15	<b>chef</b> 11:20
<b>anybody</b> 10:15	43:1	<b>black</b> 17:24	45:19	<b>child</b> 15:8
20:17, 47:13	<b>assigned</b> 9:16	<b>blacked</b> 26:10	<b>calling</b> 31:24	17:25, 18:7
48:24, 49:7	<b>associated</b> 51:13	27:6	<b>calls</b> 30:20	24:19, 24:20
49:19	<b>ASSOCIATES</b>	<b>blinds</b> 14:24	<b>Campbell</b> 13:9	<b>children</b> 11:21
<b>apartment</b> 6:20	2:12	15:6	<b>cams</b> 26:15	11:23, 12:1
				12:3, 15:3

<b>Church</b> 2:8 <b>City</b> 1:6, 2:8 <b>clarify</b> 43:9 <b>cleared</b> 34:22 <b>closer</b> 11:6 <b>coffee</b> 37:2, 37:3 <b>College</b> 2:16 <b>come</b> 9:23 22:11, 28:22 38:1, 38:6 <b>comes</b> 12:15 49:22 <b>coming</b> 38:22 38:25, 39:4 <b>commencing</b> 2:6 <b>commission</b> 51:6, 52:22 <b>committed</b> 24:6 <b>Commons</b> 11:18 <b>Commonwealth</b> 2:6, 51:1, 51:4 51:24, 52:21 <b>communication</b> 36:24 <b>company</b> 12:12 <b>complex</b> 45:17 <b>complied</b> 21:16 21:17, 27:23 <b>comply</b> 30:10 <b>concluded</b> 50:7 <b>constitutionality</b> 9:5 <b>consult</b> 44:20 <b>contact</b> 36:3 <b>contain</b> 44:10 <b>contents</b> 25:6 <b>conversation</b> 24:11 <b>convicted</b> 21:10 21:15 <b>convictions</b> 24:22 <b>cooking</b> 14:19 <b>correct</b> 51:9 <b>correctional</b>	7:13, 7:14, 8:3 8:9, 9:1, 9:21 22:22, 24:1 29:15, 32:13 33:25, 44:4 <b>corrections</b> 7:15 7:20, 7:21 43:14 <b>correctly</b> 33:21 <b>counsel</b> 2:10 2:15, 2:20, 51:9 51:13 <b>counter</b> 32:8 <b>County</b> 13:9 <b>couple</b> 4:14 37:19, 41:18 <b>course</b> 16:4 16:14, 17:22 18:12, 21:17 24:7, 24:8 24:10, 34:6 <b>court</b> 1:1, 4:15 26:16, 27:1 30:11, 36:10 44:18 <b>court-appointed</b> 19:4, 19:5 19:25 <b>cousin</b> 11:3 <b>crazy</b> 26:22 <b>cream</b> 32:10 <b>crime</b> 24:6 <b>criminal</b> 8:19 <b>curiosity</b> 27:4 <b>currently</b> 7:4	39:8 <b>day</b> 9:20, 19:6 20:5, 30:22 30:24, 33:3 35:1, 51:17 52:22 <b>days</b> 20:7, 20:8 <b>dead</b> 39:13 39:16 <b>deal</b> 8:13 <b>dealing</b> 35:12 <b>December</b> 6:17 <b>decided</b> 32:17 <b>declined</b> 15:19 <b>defendants</b> 1:7 2:2, 2:20, 4:10 <b>defensive</b> 9:9 9:11, 10:9 <b>definitely</b> 18:13 19:14, 20:4 20:16, 43:8 47:1 <b>denied</b> 16:19 <b>deny</b> 16:19 <b>Department</b> 7:15, 33:9 43:13 <b>deposed</b> 5:15 <b>deposition</b> 1:9 2:1, 37:11, 50:7 52:1 <b>depositions</b> 2:3 <b>detective</b> 36:15 36:16, 36:18 38:13 <b>die</b> 41:19 <b>died</b> 26:20 <b>difference</b> 34:15 <b>different</b> 13:12 21:2, 29:24 <b>dinner</b> 14:19 37:21 <b>direction</b> 27:23 <b>disclosed</b> 49:4 <b>disclosures</b> 40:24	<b>discussed</b> 30:12 <b>DISTRICT</b> 1:1 1:1 <b>DIVISION</b> 1:2 <b>DMV</b> 26:5 <b>doctor</b> 31:9 31:13 <b>doing</b> 5:13, 5:17 8:5, 10:3, 17:23 <b>door</b> 17:18, 28:9 28:14, 28:21 38:9, 38:9 38:12, 38:15 38:18 <b>doors</b> 17:12 22:1 <b>Dorms</b> 10:5 <b>downtown</b> 25:9 <b>Dr</b> 31:14 <b>drawn</b> 23:14 <b>drew</b> 14:15 <b>drive</b> 6:14, 26:5 <b>driver</b> 25:25 <b>driver's</b> 15:17 <b>drove</b> 25:21 <b>drugs</b> 10:6 <b>duties</b> 9:21 <b>dying</b> 16:16	48:22 <b>especially</b> 35:12 <b>ESQUIRE</b> 2:14 2:19, 2:19 <b>essentially</b> 38:23 <b>et</b> 1:3, 1:6 <b>evening</b> 14:8 14:11 <b>event</b> 51:15 <b>everybody</b> 11:7 46:21, 47:10 <b>exactly</b> 8:14 24:22 <b>Examination</b> 3:4, 3:5, 3:6, 3:7 <b>examined</b> 51:8 <b>example</b> 24:3 <b>excuse</b> 17:4 <b>exists</b> 40:6 <b>exit</b> 16:25 <b>expires</b> 51:6 52:22 <b>expunged</b> 35:5 35:14, 35:15 <b>expungement</b> 35:11, 35:20 <b>eyes</b> 41:11
			<b>E</b>	<b>F</b>
			<b>earlier</b> 14:5 <b>eat</b> 14:22, 37:21 <b>Electronic</b> 51:3 <b>emails</b> 19:6 19:7 <b>emotional</b> 18:4 19:17 <b>employed</b> 7:4 <b>employment</b> 34:1, 35:8 <b>ended</b> 17:16 20:7, 20:12 31:8, 43:4 <b>Ernest</b> 47:19 48:2, 48:20	<b>FaceTiming</b> 31:2 <b>facility</b> 7:15 7:17 <b>fact</b> 16:20 24:25, 49:14 <b>false</b> 33:9, 44:11 44:12 <b>familiar</b> 30:3 <b>family</b> 10:22 31:18, 47:10 <b>far</b> 21:13 <b>father's</b> 13:19 <b>fear</b> 17:2, 23:13 <b>feared</b> 17:13

23:23 <b>fearing</b> 23:9 <b>feel</b> 18:1, 18:2 35:17 <b>felon</b> 21:9 21:10, 21:15 <b>felony</b> 21:4 21:7 <b>fight</b> 20:15 <b>fighting</b> 10:6 <b>figure</b> 15:24 <b>file</b> 34:3, 34:4 34:8 <b>find</b> 21:12 34:16, 34:17 41:7, 46:8 <b>finish</b> 4:24, 4:25 <b>finished</b> 6:6 14:19, 37:16 <b>first</b> 5:24, 32:25 <b>FITZGERALD</b> 2:19, 47:5 <b>five</b> 26:4 <b>fix</b> 30:10 <b>flashing</b> 14:23 <b>floor</b> 8:2, 14:18 <b>folks</b> 33:24 <b>follows</b> 4:4 <b>food</b> 7:7, 7:8 14:22, 32:14 32:19, 34:10 34:25, 35:3 43:16 <b>foregoing</b> 51:9 <b>Forest</b> 51:17 <b>Fort</b> 37:7, 37:9 <b>forward</b> 35:7 <b>found</b> 34:14 <b>four-and-a-half</b> 7:10 <b>frankly</b> 41:19 <b>front</b> 14:15 14:16, 14:18 25:13, 25:17 25:19, 25:23 38:9, 38:12	<b>full</b> 34:25, 35:2 51:10 <b>funny</b> 25:20 <b>further</b> 51:12  <b>G</b>  <b>generally</b> 13:8 25:25 <b>Germany</b> 13:4 <b>getting</b> 14:21 16:16, 20:14 29:19, 34:23 37:21 <b>give</b> 19:8, 19:20 23:13, 24:3 38:16, 40:15 <b>given</b> 7:1, 51:16 <b>giving</b> 34:20 <b>glad</b> 6:3, 32:23 <b>glass</b> 38:18 <b>go</b> 5:11, 8:8 10:2, 13:2, 13:5 13:6, 15:11 15:21, 18:14 30:8, 30:11 31:8, 31:25 33:6, 34:9 35:12, 35:15 37:2, 38:10 42:1, 44:21 <b>God</b> 12:24 19:22 <b>God's</b> 19:15 <b>goes</b> 4:19, 36:25 37:2 <b>going</b> 4:13, 4:15 5:1, 5:20, 10:1 10:1, 16:4, 17:3 18:20, 20:2 20:5, 21:11 26:11, 27:12 30:8, 34:6, 35:7 35:8, 35:17 38:2, 39:12 39:16, 41:18	42:1, 44:6 44:18, 45:18 47:11, 49:15 <b>good</b> 4:7, 4:8 11:5, 44:24 <b>Google</b> 22:4 22:5, 22:6, 22:7 22:7, 22:21 30:8, 30:9 <b>Googled</b> 22:8 22:10 <b>gotten</b> 21:1 21:3 <b>grab</b> 28:17 <b>grabbed</b> 15:11 15:11 <b>grace</b> 19:15 <b>grandchildren</b> 12:18, 12:21 13:15 <b>granted</b> 19:25 <b>grievance</b> 34:3 34:4, 34:8 <b>Grooms</b> 15:20 <b>ground</b> 18:6 18:8, 27:20 28:7, 28:23 28:24, 29:5 29:8, 29:10 46:16 <b>gruesome</b> 41:21 <b>guess</b> 20:14 21:18, 27:13 44:5, 45:18 <b>Gwynn</b> 2:16 2:19, 3:4, 3:6 4:6, 4:9, 11:6 11:9, 11:11 18:20, 18:22 19:1, 26:9 35:23, 37:14 37:16, 39:15 39:25, 40:5 40:9, 40:14 40:20, 41:1 41:3, 41:6, 41:9	41:12, 41:22 44:15, 44:24 45:3, 46:12 47:15, 49:5 50:1, 50:3  <b>H</b>  <b>hallway</b> 9:23 <b>hand</b> 51:16 <b>handcuffed</b> 18:5 18:8, 27:16 27:18, 28:4 28:24, 29:8 <b>handcuffing</b> 27:13 <b>hands</b> 42:3 42:11 <b>hands-on</b> 10:17 <b>happen</b> 18:13 19:21, 20:4 25:12, 37:12 <b>happened</b> 14:7 14:12, 19:14 21:21, 26:14 26:19, 43:10 43:10, 43:19 <b>happy</b> 18:23 <b>hate</b> 41:21 <b>he'll</b> 20:16 <b>Head</b> 13:5 <b>Health</b> 31:15 <b>hear</b> 6:1, 6:2 6:2, 24:11, 47:1 47:2 <b>heard</b> 6:7, 19:18 19:18, 38:7 <b>heart</b> 20:8 <b>Heights</b> 31:15 <b>help</b> 4:20, 5:1 8:16, 16:14 <b>Henderson</b> 1:25 2:4, 51:2, 51:23 <b>hide</b> 29:25 <b>holding</b> 24:25 <b>holler</b> 38:7	<b>home</b> 38:22 <b>honest</b> 11:3 <b>hoping</b> 11:2 20:9 <b>hours</b> 34:10 <b>house</b> 14:21 39:2 <b>huge</b> 46:11 <b>Huggins</b> 49:2 <b>Huh</b> 48:1 <b>huh-uh</b> 5:4 <b>husband</b> 14:20 37:23, 38:3 40:20, 48:23 <b>husband's</b> 11:14 40:21  <b>I</b>  <b>ibuprofen</b> 32:10 <b>incident</b> 7:1 14:6, 25:20 30:13, 30:15 32:21, 33:1 33:10, 33:14 33:23, 35:24 <b>include</b> 9:3 <b>included</b> 22:23 <b>increase</b> 34:10 <b>indicated</b> 27:5 <b>information</b> 22:8, 44:10 44:11 <b>injuries</b> 32:1 <b>inmate</b> 10:17 <b>inmates</b> 8:13 9:23, 24:8 29:12 <b>inquired</b> 44:5 <b>instantly</b> 15:11 <b>interaction</b> 36:23 <b>interested</b> 51:14 <b>internet</b> 17:3 17:5, 20:22 21:11, 21:20
--	--	---	--	---

<b>interview</b> 34:22 <b>inventoried</b> 25:5 <b>iPad</b> 40:1 <b>iPhone</b> 39:22 <b>issue</b> 35:8 <b>it'll</b> 30:9	15:12, 15:14 <b>Kiari</b> 13:14 <b>kidding</b> 18:24 19:2 <b>Kimberly</b> 1:25 2:4, 51:2, 51:23 <b>kind</b> 5:10, 14:14 26:10 <b>kneeled</b> 27:15 27:21 <b>knew</b> 20:2 <b>know</b> 4:17, 5:8 5:9, 5:11, 8:12 8:13, 8:15, 8:22 8:24, 9:25 12:16, 13:6 13:17, 15:6 15:25, 16:2 16:15, 16:20 17:2, 17:4 17:19, 17:24 18:3, 18:4 19:19, 19:20 20:5, 20:16 21:4, 21:6 21:11, 21:15 22:2, 22:8, 22:9 22:11, 24:13 25:2, 25:3, 25:4 25:10, 26:20 30:10, 31:10 31:11, 32:24 33:3, 33:5, 33:7 33:18, 34:9 35:11, 35:14 35:25, 36:21 37:12, 38:8 38:8, 40:24 43:1, 44:5 45:11, 46:18 47:9, 47:10 47:11, 47:21 49:10, 49:17 49:18, 49:18 <b>knowledge</b> 36:4 <b>knows</b> 11:7	36:21, 41:7 <b>Kozak</b> 31:14 31:14, 31:16 <b>kthomas@vbcl...</b> 2:14  <b>L</b>  <b>Large</b> 2:6, 51:1 51:5, 51:24 <b>law</b> 17:20, 24:17 <b>lawsuit</b> 4:11, 7:2 <b>lawyer</b> 18:15 18:19, 19:25 20:3, 20:14 31:24, 34:7 <b>lay</b> 42:3, 42:10 <b>leaving</b> 33:19 <b>lectures</b> 9:3 <b>left</b> 34:11 <b>LEGAL</b> 2:12 <b>legs</b> 29:17, 32:3 <b>letter</b> 44:1, 44:1 44:3, 44:7 <b>letting</b> 43:4 <b>license</b> 15:17 25:13, 25:17 25:19, 25:21 <b>licenses</b> 25:17 <b>lie</b> 24:8, 35:13 <b>lied</b> 18:9 <b>life</b> 17:2, 17:14 23:10, 23:14 23:24 <b>lights</b> 14:23 26:2, 37:20 45:17, 46:11 <b>Lion</b> 7:7, 7:9 32:14, 32:19 34:10, 34:25 35:3, 43:16 <b>list</b> 12:14 <b>little</b> 5:10, 8:16 11:2, 20:18 26:11, 32:10 40:2	<b>live</b> 6:10, 6:12 6:19, 12:7, 13:8 13:25, 30:17 30:18, 38:19 47:25, 48:2 48:3, 48:4 <b>lived</b> 6:16, 14:17 48:5 <b>lives</b> 10:22, 13:3 45:16 <b>living</b> 6:23 <b>localities</b> 8:23 <b>lock</b> 17:11 21:25, 42:22 <b>LOCKABY</b> 2:16 <b>locked</b> 15:12 <b>long</b> 6:16, 7:8 7:21, 9:12, 15:2 26:5 <b>look</b> 5:10, 26:14 26:25 <b>looked</b> 14:7 27:2 <b>looking</b> 17:3 17:4, 21:21 26:23, 27:1 <b>losing</b> 32:24 <b>lost</b> 33:1 <b>lot</b> 17:23, 17:25 18:25, 29:24 35:11, 46:11 <b>luck</b> 11:5 <b>lying</b> 43:3 <b>Lyn-CAG</b> 13:5 <b>Lynchburg</b> 1:2 1:6, 1:12, 2:8 2:9, 2:13, 6:12 6:14, 6:21 10:19, 10:23 12:7, 13:9, 26:8 33:8, 33:24 37:1, 44:2, 44:3 <b>LYNETTE</b> 1:3 3:3, 4:3, 52:2 52:19	<b>M</b>  <b>Ma</b> 17:2 <b>Madison</b> 31:14 <b>magistrate</b> 42:19, 42:20 <b>magistrate's</b> 18:9, 20:6 <b>making</b> 8:5 10:5 <b>man</b> 17:15 17:17 <b>Marcello</b> 11:16 40:22 <b>marijuana</b> 24:23 <b>marks</b> 32:11 <b>married</b> 11:12 <b>mean</b> 4:16, 5:16 29:18, 33:15 37:11, 38:25 39:3 <b>medical</b> 32:5 <b>medication</b> 31:10, 31:11 <b>Memorial</b> 7:7 37:1, 37:6 37:12 <b>mentioned</b> 31:4 45:5 <b>merchandise</b> 9:25 <b>mercy</b> 19:15 <b>military</b> 13:4 <b>Miller</b> 15:21 16:21, 16:21 36:17, 36:18 38:13, 42:4 42:25, 44:8 <b>mind</b> 49:22 <b>minute</b> 15:6 33:12 <b>mix</b> 21:2 <b>mom</b> 13:4, 14:1 26:5, 45:15 45:16, 46:13
<b>J</b>				
<b>J.J</b> 13:13 <b>Jaden's</b> 13:12 <b>jail</b> 20:7, 49:15 <b>JAMES</b> 2:12 <b>Jarvis</b> 12:6 <b>Jim</b> 2:19, 4:9 <b>jimg@guynnw...</b> 2:18 <b>job</b> 7:19, 9:21 18:15, 20:3 32:25, 33:1 33:9, 33:10 33:16, 33:18 34:14, 34:16 34:18, 34:20 34:24 <b>jobs</b> 33:13 35:12 <b>JOHN</b> 2:19 <b>john@guynnw...</b> 2:18 <b>Johnson</b> 31:15 <b>joined</b> 16:8 <b>JR</b> 2:19 <b>jury</b> 11:1, 11:4 12:14 <b>justice</b> 8:19				
<b>K</b>				
<b>K-o-z-a-k</b> 31:16 <b>K9</b> 16:22, 16:24 <b>Kemper</b> 6:20 48:4, 48:5 <b>key</b> 15:13, 38:10 <b>keys</b> 15:11				



<b>mom's</b> 47:6 48:12 <b>moment</b> 19:11 21:4, 25:7 <b>months</b> 19:8 <b>morning</b> 4:7 4:8, 4:14 <b>mother</b> 17:19 17:19, 48:15 <b>Mother's</b> 35:1 <b>mouth</b> 47:1 47:2 <b>moved</b> 6:17 <b>moving</b> 21:19 48:6	<b>notice</b> 2:3, 25:12 <b>November</b> 48:7 51:6, 51:17 <b>nudged</b> 38:15 <b>number</b> 48:12 48:21, 51:5 <b>numbers</b> 48:8	5:25, 6:4, 6:9 6:25, 7:6, 8:5 8:18, 9:12 10:14, 10:22 11:14, 11:21 12:5, 13:8 13:20, 15:4 18:21, 19:16 23:21, 23:25 26:6, 27:11 27:17, 30:19 30:23, 30:25 31:7, 31:16 32:16, 33:17 35:2, 36:14 36:16, 36:19 37:4, 37:8 38:22, 39:11 39:18, 40:12 40:20, 41:20 45:11, 46:1 46:24, 47:22 48:16, 48:22 49:11, 49:21 49:24, 49:25 <b>oldest</b> 17:5, 18:7 21:1 <b>once</b> 29:7 <b>ones</b> 13:6 <b>open</b> 15:6 <b>opened</b> 17:17 28:9, 28:14 28:21 <b>opinion</b> 19:10 19:12, 20:14 <b>opportunity</b> 26:13 <b>order</b> 24:4 <b>originally</b> 10:20 45:13 <b>ought</b> 41:6 <b>outside</b> 14:10 14:18, 15:11 15:15, 20:20	<b>P</b>	29:9 <b>picking</b> 11:1 <b>place</b> 8:14 17:23, 26:18 <b>places</b> 29:25 43:11 <b>Plaintiffs</b> 1:4 2:15 <b>plans</b> 41:22 <b>plate</b> 25:13 25:21 <b>plated</b> 14:21 <b>played</b> 27:2 <b>please</b> 18:19 <b>plus</b> 26:4 <b>point</b> 16:13 16:20, 23:12 27:14, 38:6 <b>police</b> 16:15 19:19, 21:3 21:8, 22:9, 22:9 26:21, 33:8 33:24, 34:20 36:1, 44:2, 44:3 <b>policies</b> 9:4 <b>possession</b> 24:23 <b>pregnant</b> 18:7 <b>prepare</b> 4:15 44:18 <b>prescribed</b> 31:9 <b>prior</b> 35:24 <b>prison</b> 8:13 <b>private</b> 29:18 <b>probable</b> 24:2 24:3, 24:5 24:12 <b>probably</b> 10:25 31:11, 41:6 44:20 <b>probation</b> 34:24 <b>problem</b> 24:19 50:5 <b>problems</b> 24:16 <b>proceeding</b> 51:14
<b>N</b>	<b>O</b>			
<b>name</b> 4:9, 8:14 11:15, 12:15 13:13, 14:3 18:19, 31:10 40:21, 42:22 44:20, 47:3 47:6, 47:18 <b>named</b> 49:9 <b>names</b> 12:5 13:11, 13:17 13:19 <b>Nazari</b> 13:14 <b>need</b> 19:12 <b>needed</b> 15:24 19:23 <b>neither</b> 51:12 <b>never</b> 10:14 10:17, 20:16 20:16, 36:3 42:5, 43:4 <b>night</b> 17:24 18:5, 25:1, 33:1 39:4 <b>nosy</b> 12:14, 15:7 <b>Notarial</b> 51:16 <b>Notary</b> 2:5, 51:4 51:5, 51:23 52:25, 52:25	<b>oath</b> 45:4 <b>Objection</b> 18:18 <b>obligated</b> 35:17 <b>obstruction</b> 19:9 <b>obviously</b> 28:9 29:18 <b>occasion</b> 29:11 <b>October</b> 1:10 2:7, 4:1, 52:3 <b>offering</b> 18:16 <b>office</b> 18:10 20:6 <b>officer</b> 7:20 7:22, 8:9, 9:1 9:21, 15:20 15:21, 16:21 16:25, 17:16 21:22, 22:22 23:17, 23:18 23:19, 23:20 24:1, 28:16 34:20, 42:4 42:23, 42:25 42:25 <b>officers</b> 18:12 19:13, 19:19 24:12, 26:15 27:12, 30:2 30:6, 36:1 <b>offices</b> 2:7 <b>oh</b> 12:24, 16:21 37:7, 39:18 39:25, 44:22 <b>okay</b> 4:23, 5:2 5:7, 5:13, 5:19	<b>once</b> 29:7 <b>ones</b> 13:6 <b>open</b> 15:6 <b>opened</b> 17:17 28:9, 28:14 28:21 <b>opinion</b> 19:10 19:12, 20:14 <b>opportunity</b> 26:13 <b>order</b> 24:4 <b>originally</b> 10:20 45:13 <b>ought</b> 41:6 <b>outside</b> 14:10 14:18, 15:11 15:15, 20:20	<b>P.C</b> 2:16 <b>pad</b> 39:21 39:24 <b>page</b> 3:2, 29:22 <b>Page/Line</b> 52:5 <b>Pannell</b> 11:23 13:13, 13:22 15:9, 15:10 15:10 <b>parents</b> 13:23 <b>parole</b> 34:24 <b>part</b> 27:3, 32:17 <b>particular</b> 4:21 22:12 <b>parts</b> 27:3 <b>party</b> 51:13 <b>passing</b> 9:25 10:6 <b>Paul</b> 2:14, 19:18 <b>pay</b> 20:8 <b>paying</b> 20:12 <b>people</b> 9:8 16:15, 19:20 22:23, 29:25 48:9 <b>perfect</b> 24:19 <b>period</b> 20:3 43:7, 43:9 46:23 <b>permission</b> 19:12 <b>person</b> 20:2 48:25 <b>person's</b> 12:15 <b>personally</b> 36:7 <b>phone</b> 31:2 38:14, 38:16 39:20, 45:6 45:8, 48:8 48:12 <b>physical</b> 8:11 32:1 <b>physician</b> 31:19 <b>picked</b> 29:1	

<b>process</b> 29:3 48:6 <b>Professional</b> 2:5 51:3 <b>program</b> 9:13 <b>prompt</b> 5:10 44:15 <b>prosecuting</b> 19:7 <b>Public</b> 2:5, 51:4 51:23, 52:25 <b>pull</b> 19:20 19:23, 19:23 21:8 <b>pulled</b> 15:1 17:18, 17:21 21:3, 21:14 39:1 <b>pulling</b> 17:17 <b>punch</b> 22:6 <b>punching</b> 22:21 <b>purposes</b> 35:22 <b>pursuant</b> 2:2 <b>pushed</b> 38:17 <b>put</b> 24:9, 25:8 29:2, 29:4, 29:8 29:10, 38:13 40:25 <b>putting</b> 28:7	<b>Reading</b> 50:6 <b>ready</b> 14:21 14:22, 37:21 <b>realize</b> 35:19 <b>really</b> 12:13 20:7, 20:15 26:25, 38:8 <b>reason</b> 16:1 23:13, 36:6 52:5 <b>recall</b> 14:9 24:18, 27:12 28:20, 29:6 30:1, 30:4 <b>Recess</b> 37:17 45:1 <b>recognizance</b> 43:5 <b>recommended</b> 20:17 <b>record</b> 18:19 34:19, 35:4 <b>recording</b> 16:17 <b>records</b> 14:7 <b>red</b> 26:2 <b>Reed</b> 16:25 17:16, 23:20 28:16, 42:10 42:11, 42:13 42:25 <b>reflect</b> 6:8 <b>refuse</b> 21:23 <b>refused</b> 17:16 <b>regard</b> 27:23 <b>regarding</b> 24:12 <b>Registered</b> 2:4 51:3 <b>Registration</b> 51:5 <b>regular</b> 9:20 30:16, 31:18 <b>related</b> 51:13 <b>remember</b> 22:16, 24:22 25:15, 38:10 41:1, 42:21	44:8, 44:9 48:24, 49:8 49:20 <b>remind</b> 27:8 <b>reminds</b> 49:23 <b>remove</b> 30:3 <b>removing</b> 28:5 <b>repeat</b> 6:3 <b>report</b> 33:2 33:6, 33:8 <b>REPORTED</b> 1:25 <b>reporter</b> 2:5 4:15, 44:18 51:3 <b>reports</b> 33:23 <b>represent</b> 4:10 <b>REQUESTED</b> 52:1 <b>reserved</b> 50:6 <b>rest</b> 26:7 <b>restricted</b> 43:6 43:8 <b>result</b> 32:2 <b>review</b> 44:16 <b>right</b> 5:8, 5:13 6:10, 14:17 18:2, 18:2, 30:6 34:6, 37:10 37:14, 39:12 39:14, 39:18 41:12, 41:24 42:18, 43:14 43:17, 44:7 44:16, 44:19 46:8, 48:20 48:25, 49:13 <b>rise</b> 7:2 <b>RIVER</b> 2:12 <b>Road</b> 2:12 <b>roll</b> 22:13, 23:2 <b>rolling</b> 20:22 <b>rotate</b> 9:18 <b>rounds</b> 8:5 <b>RPR</b> 1:25 <b>Rule</b> 40:24, 47:4	<b>run</b> 8:22, 8:23 36:11, 36:14 <b>rundown</b> 11:2  <b>S</b>  <b>safe</b> 25:25 <b>Salem</b> 2:17 <b>salve</b> 32:9 <b>Sandidge</b> 11:16 11:25, 13:14 16:10, 40:22 <b>saw</b> 14:15 14:23, 15:8 20:25, 37:20 41:9, 46:18 <b>saying</b> 16:21 19:13, 21:22 23:9, 25:16 42:14 <b>scene</b> 15:20 16:25, 26:19 45:15, 45:20 <b>school</b> 12:25 13:7, 29:15 <b>schools</b> 13:2 <b>scratched</b> 32:3 <b>seal</b> 51:16 52:25 <b>search</b> 15:19 15:23, 15:24 16:2, 21:16 24:13, 29:12 29:17, 29:19 <b>searched</b> 27:19 28:1, 28:3, 29:4 29:9 <b>searching</b> 27:24 <b>second</b> 5:3 19:10, 19:12 20:13, 33:16 47:5 <b>secure</b> 16:17 <b>see</b> 8:16, 15:22 20:3, 27:22 30:16, 30:19	31:1, 31:9 31:21, 31:25 34:5, 36:20 38:18, 42:13 <b>seek</b> 32:5 <b>seen</b> 20:21 23:12, 45:17 <b>sense</b> 24:20 <b>sent</b> 19:6, 44:2 44:2, 44:3 <b>September</b> 8:1 32:18 <b>Seth</b> 42:10 42:11, 42:13 <b>seven</b> 20:7, 20:8 <b>Shanta</b> 1:3, 1:9 2:1, 3:3, 4:3 11:7, 41:19 52:2, 52:19 <b>she'll</b> 48:6 <b>shifts</b> 9:18 <b>short</b> 46:10 <b>shot</b> 16:16 <b>show</b> 28:5 <b>showed</b> 27:25 <b>showing</b> 34:19 <b>shows</b> 35:20 <b>side</b> 16:5, 19:25 43:1 <b>sidewalk</b> 16:6 <b>sign</b> 43:5, 44:19 44:23 <b>signature</b> 50:6 <b>signed</b> 44:8 <b>signs</b> 26:2 <b>sir</b> 4:8, 6:24, 7:3 11:24, 12:8 42:5, 42:12 42:15, 42:17 50:5 <b>sit</b> 37:21 <b>sitting</b> 27:1 <b>situation</b> 17:5 18:14, 21:2 21:13, 24:10 26:18, 26:22
<b>Q</b>				
<b>question</b> 4:25 5:21, 22:21 35:13 <b>questions</b> 4:14 5:20, 6:7, 6:7 15:18, 37:19 41:13, 41:15 44:13				
<b>R</b>				
<b>reach</b> 28:17 <b>read</b> 44:16 44:22, 44:23				

34:5, 34:9 34:17 <b>situations</b> 16:15 19:18 <b>six</b> 9:14, 19:8 <b>slow</b> 26:5 <b>smile</b> 12:20 <b>somebody</b> 15:1 16:7, 19:24 24:4, 26:20 49:22 <b>son</b> 17:5, 17:23 21:1, 21:10 23:1, 24:16 27:13, 30:2 30:12, 38:19 48:23 <b>soon</b> 40:19 <b>sorry</b> 19:15 37:10, 39:16 47:14 <b>sort</b> 8:6, 9:8 27:6, 27:8 <b>sound</b> 30:3 <b>sounds</b> 41:10 <b>speak</b> 21:24 <b>specifically</b> 43:25 <b>spell</b> 5:6 <b>spends</b> 39:3 <b>stand</b> 9:22 <b>standing</b> 16:5 16:18, 27:19 28:2, 29:7, 38:9 38:12 <b>standpoint</b> 35:9 <b>Start</b> 13:5 <b>started</b> 7:25 15:18, 32:18 32:19 <b>state</b> 7:17, 8:22 25:18, 34:18 35:13 <b>STATES</b> 1:1 <b>Stella</b> 47:7, 47:8 48:2, 48:15	48:22 <b>stood</b> 15:5, 29:9 <b>stop</b> 15:16 15:23, 26:2 26:2, 30:7 <b>stopped</b> 25:22 <b>store</b> 37:1 <b>Street</b> 2:8, 6:20 48:4, 48:5 <b>stress</b> 4:21 <b>struggle</b> 34:13 <b>stuff</b> 10:6, 21:21 22:8, 22:11 26:23, 32:11 32:20, 37:2 43:7, 47:12 <b>Subscribed</b> 52:21 <b>supervisor</b> 17:8 17:9, 17:10 17:11, 21:24 21:24, 22:14 <b>suppose</b> 28:19 38:24 <b>supposed</b> 10:2 17:6, 17:10 17:11, 21:25 24:9, 49:19 <b>sure</b> 4:9, 5:19 6:5, 9:24, 10:1 10:5, 20:10 21:18, 30:24 37:15, 41:14 45:15, 49:17 49:23 <b>Surrounding</b> 12:9 <b>suspended</b> 32:25, 33:7 43:20 <b>sworn</b> 4:4, 51:8 52:21  <b>T</b>  <b>tablet</b> 40:3, 40:4	45:7, 45:9 45:13, 45:20 46:5 <b>tactics</b> 9:10 9:11, 10:9 <b>tag</b> 25:19 <b>take</b> 2:3, 19:8 25:8, 37:11 38:14 <b>taken</b> 2:1, 13:18 18:1, 18:9 46:15, 52:3 <b>takes</b> 4:17 17:25 <b>talk</b> 4:22, 30:14 36:24, 46:19 46:22 <b>talked</b> 36:22 42:21, 46:17 <b>talking</b> 9:7 15:20, 17:1 19:3, 45:5, 45:7 46:23 <b>taught</b> 29:14 <b>teach</b> 24:1 29:20 <b>tears</b> 26:17 <b>tell</b> 5:21, 12:24 17:9, 18:16 20:24, 21:9 22:7, 35:17 43:1, 46:16 49:19, 49:23 <b>telling</b> 19:7 30:1, 30:2 31:24, 33:22 <b>terminated</b> 33:11, 34:1 43:22 <b>termination</b> 43:24 <b>terrifying</b> 26:17 <b>Terron</b> 15:10 <b>testified</b> 4:4 <b>testimony</b> 4:16 27:5, 44:17	51:10 <b>thank</b> 19:22 44:24, 50:3 <b>thanks</b> 5:14 18:25 <b>Theory</b> 13:14 <b>thereof</b> 51:15 <b>thing</b> 5:3, 8:6 9:8, 40:3, 41:11 43:3 <b>things</b> 4:14 4:19, 9:4, 9:5 22:7, 24:8 29:25 <b>think</b> 6:22, 7:25 9:14, 23:16 25:7, 25:15 28:1, 28:8 29:22, 36:21 38:7, 42:22 45:10, 45:15 46:15, 47:20 49:3, 49:4 49:16 <b>thought</b> 33:15 34:6 <b>threaten</b> 42:8 <b>threw</b> 27:20 <b>throw</b> 8:12 <b>throwing</b> 9:8 <b>thrown</b> 18:6 18:8 <b>ticket</b> 21:19 <b>Tiffany</b> 49:2 49:7 <b>Tiffany's</b> 49:3 <b>Timberlake</b> 2:12 <b>time</b> 7:23, 15:13 15:21, 18:7 26:6, 32:12 32:17, 34:7 34:25, 35:2 38:20, 39:4 42:23, 47:21 <b>today</b> 4:16, 5:13	5:17 <b>told</b> 4:10, 5:20 10:25, 17:6 17:13, 17:15 21:14, 23:5 42:24, 43:3 47:20, 48:25 <b>touch</b> 8:12, 42:6 <b>touched</b> 43:4 <b>town</b> 11:8 <b>traffic</b> 15:16 15:23 <b>trained</b> 10:8 <b>training</b> 8:8 8:11, 9:4, 10:12 22:23, 24:1 <b>transcribed</b> 2:2 <b>transcript</b> 4:16 44:17, 51:10 <b>transferred</b> 45:10, 45:12 45:25 <b>traveling</b> 43:7 <b>treatment</b> 32:6 <b>tree</b> 12:12 <b>tried</b> 20:1 <b>true</b> 51:9 <b>trust</b> 5:24 <b>truthful</b> 42:16 44:10 <b>try</b> 4:21, 4:22 5:3, 29:19 29:25 <b>trying</b> 15:24 21:11, 24:21 34:16, 34:17 38:13, 38:16 41:1 <b>turn</b> 33:10 <b>turned</b> 27:20 <b>two</b> 4:20, 13:5 42:25, 43:11 46:2
--	---	--	--	---

<b>U</b>	25:19, 29:8 <b>vehicles</b> 28:2 <b>video</b> 22:19 26:14, 26:23 26:25, 27:1 27:8, 27:25 28:5, 28:20 30:1, 39:8 39:19, 42:13 45:6, 45:22 45:24 <b>videoing</b> 16:14 45:14, 45:21 <b>videos</b> 22:20 46:2 <b>view</b> 14:18 <b>viewed</b> 39:6 <b>Virginia</b> 1:1 1:12, 2:6, 2:9 2:13, 2:17, 6:15 6:21, 22:9 25:18, 51:1 51:5, 51:17 51:24, 52:21	<b>way</b> 26:19, 42:8 44:21 <b>weapon</b> 23:14 <b>website</b> 22:16 <b>weeks</b> 9:14 <b>went</b> 8:10, 8:15 10:17, 14:25 20:20, 21:13 21:18, 30:13 31:21, 33:23 42:25 <b>WESTERN</b> 1:1 <b>whatnot</b> 21:10 <b>wind</b> 17:6, 17:7 17:12, 17:13 21:25 <b>window</b> 14:25 15:5, 15:7 21:25, 22:13 49:1 <b>windows</b> 17:6 17:7, 17:12 17:13, 20:22 23:2 <b>wit</b> 51:1, 52:21 <b>WITNESS</b> 3:2 37:7, 37:9 39:21, 39:24 40:1, 40:4 40:22, 41:24 46:4, 46:7 46:10, 47:7 47:9, 50:5 <b>wondering</b> 16:23 <b>work</b> 7:6, 8:2 9:16, 11:17 12:11, 12:15 40:8 <b>worked</b> 7:8 <b>working</b> 7:11 29:12, 32:13 32:14, 32:16 32:24, 33:19 43:11, 43:13 43:16	<b>worse</b> 33:11 <b>wrestle</b> 10:14	<b>2</b>
<b>uh-huh</b> 5:4 <b>uncomfortable</b> 29:21 <b>understand</b> 5:21, 5:22, 11:9 33:21, 49:16 <b>understood</b> 6:6 19:3 <b>unit</b> 16:22 16:24, 29:9 <b>UNITED</b> 1:1 <b>units</b> 9:23, 28:2 <b>upset</b> 49:14 <b>upsets</b> 46:21 <b>use</b> 5:4, 10:11		<b>Y</b>	<b>2017</b> 8:1, 32:18 <b>2020</b> 6:23, 6:25 7:12, 7:24, 7:25 14:6, 35:25 <b>2023</b> 6:18 <b>2024</b> 1:10, 2:7 4:1, 51:18, 52:3 <b>2025</b> 51:6 <b>24153</b> 2:17 <b>24501</b> 6:15, 6:21 <b>24502</b> 2:13 <b>25</b> 1:10, 2:7, 4:1 52:3 <b>26</b> 40:24, 47:4 <b>28th</b> 6:23, 6:25 7:11, 14:5 35:25	
<b>V</b>		<b>y'all</b> 37:20 <b>Yea</b> 46:4 <b>yeah</b> 7:25, 14:10 14:11, 14:13 16:13, 22:6 24:10, 24:24 24:24, 27:2 27:7, 28:7 28:12, 28:17 29:20, 29:21 32:3, 32:10 35:21, 38:4 39:17, 39:21 40:4, 40:6 40:11, 40:17 41:3, 41:8 41:12, 41:18 44:22, 46:7 46:13, 46:22 47:5, 47:17 48:10, 48:12 <b>year</b> 7:23, 19:8 25:22, 34:25 <b>years</b> 7:10 <b>YouTube</b> 22:19 22:20	<b>3</b>	
<b>Valois</b> 2:14, 3:5 3:7, 4:10, 5:19 10:25, 11:5 11:7, 18:18 18:21, 18:23 18:25, 19:4 26:7, 35:22 37:5, 37:8 37:10, 37:15 37:18, 39:14 39:20, 39:22 40:3, 40:8 40:13, 40:16 40:18, 40:23 41:2, 41:4, 41:8 41:10, 41:14 41:17, 41:25 44:13, 44:22 46:2, 46:5, 46:8 47:3, 47:6, 47:8 47:13, 47:24 49:3, 49:6, 50:2 <b>vehicle</b> 15:8 15:19, 16:1 17:1, 17:17 17:18, 21:16	<b>W</b>	<b>Zach</b> 42:3 <b>Zachary</b> 42:4 44:8	<b>30</b> 51:6 <b>3262</b> 48:19 <b>359658</b> 51:6	
	<b>WADDELL</b> 2:16 <b>wait</b> 4:24, 4:25 16:21, 34:21 <b>waive</b> 44:19 <b>walk</b> 14:14 <b>want</b> 6:5, 17:9 17:10, 18:15 20:15, 21:24 44:20, 46:23 47:10 <b>wanted</b> 16:16 16:25, 19:8 24:13, 32:17 34:4, 44:5 <b>wanting</b> 32:20 <b>watch</b> 17:25 18:5 <b>watching</b> 10:4	<b>Z</b>	<b>4</b>	
		<b>1</b>	<b>4</b> 3:4 <b>41</b> 3:5 <b>415</b> 2:16 <b>434</b> 48:16 <b>434)439-6869</b> 48:21 <b>434)818-3</b> 48:13 <b>434.845.4529</b> 2:13 <b>45</b> 3:6 <b>47</b> 3:7	
		<b>103</b> 6:20 <b>11:16</b> 1:11, 50:7 <b>12</b> 12:22, 13:15 <b>1445</b> 6:14 <b>1503</b> 6:20 <b>19</b> 32:19	<b>5</b>	
			<b>540.387.2320</b> 2:17	

<b>6</b>				
<b>6:23cv00054</b> 1:5				
<b>7</b>				
<b>7601</b> 2:12 <b>7-Eleven</b> 36:25 37:6, 37:12				
<b>8</b>				
<b>818</b> 48:17, 48:18 <b>8th</b> 51:17				
<b>9</b>				
<b>9:36</b> 1:11, 2:7 4:1 <b>900</b> 2:8				